Federal Communication Commission
December 12, 2018

I agree that proprietary transmission technologies have no place in amateur radio. We are supposed to self-regulate ourselves, and this becomes problematic. I'd like to see amateur radio get away from the list of permitted emission types. I have been commenting on this since RM-11625 (2011) brought it to my attention that this model is no longer a feasible model for the future.

I also am in favor of what the commission is proposing regarding RM-11708. The ARRL's proposal was acceptable to me for HF, setting the hard bandwidth limit, to replace the symbol rate. However their proposal totally ignored above 30 MHz, where the band space is more plentiful, and there is less crowding. I was going to suggest above 30 MHz that there be no bandwidth limit, just as there is now above 902 MHz.

In reading the FCC's response, I do agree that that setting a bandwidth limit for HF is not the long-term answer. One of the big concerns for HF is automated Pactor and other proprietary modes and the potential for wide bandwidths. There have been concerns above 30 MHz with various digital voice modes, like D-Star and DMR using a proprietary AMBE vocoder. Again, the concerns are in being able to monitor ourselves as well as hampering our ability to self educate and innovate, by being forced to buy a black box.

In a reply RM-11625 comment from Bruce Perens in 2012, he made the suggestion that comment that only open source protocols be allowed…
(https://ecfsapi.fcc.gov/file/7022090358.pdf)

"Amend Section 97.309(a) to read:
Any digital code that is fully disclosed to the public in sufficient detail that a Knowledgeable person can create a computer program to encode and decode it, or any digital code of a type specifically authorized in this part, may be transmitted."

I'd be in favor of Bruce's suggested emission code language in conjunction with the FCC's intended resolution for removing the symbol rate and not adopting a bandwidth limit.

Many may respond that this will there would be detrimental effects from banning existing technology like Pactor and AMBE. Radio amateurs will simply have to undertake an joint effort to reverse engineer protocols and/or petition the manufacturer's to create an open specification of their technology.

APCO (the Association of Public-Safety Communications Officials) required this very thing in relation to their standard, P-25. And ham radio should also adopt that type of policy. The future of radio is more and more software defined, so sharing information/specifications and working together is what ham radio has always been about.

Respectfully,

Steve Lampereur